

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

THE UNITED STATES OF AMERICA

v.

No. 19-cr-00251-LM

JOHNATHON IRISH

**ASSENTED-TO MOTION TO EXTEND DEADLINE**

Johnathan Irish, through counsel, requests that the Court extend the deadline to file his Supplement to Motion for a New Trial from July 3, 2020 to July 6, 2020, for the reasons set forth below. The court set the July 3, 2020 deadline at the request of the defense. However, on July 2, 2020, counsel had a lengthy conversation with Mr. Irish which necessitated the reframing of certain issues. In addition, counsel had not recognized that July 3, 2020 was in fact a legal holiday. The defense is filing the Supplement to the Motion for New Trial today, July 6<sup>th</sup> and the defense requests a similar short extension of the government's deadline. Assistant United States Attorney Anna Krasinski assents to this motion.

WHEREFORE, the defense respectfully asks that Court to extend the deadline for filing the Supplement to Motion for a New Trial from July 3, 2020 to July 6, 2020.

Date: July 6, 2020

Respectfully submitted,

*/s/ Richard Guerriero*  
Richard Guerriero, Esq.  
N.H. Bar ID. 10530  
Lothstein Guerriero, PLLC  
Chamberlain Block Building  
39 Central Square, Suite 202  
Keene, NH 03431  
Telephone: (603) 352-5000

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on the date the document was signed by me.

*/s/ Richard Guerriero*  
Richard Guerriero